table indicates the types of interfaces agreed to between AT&T and SWBT at the conceptual level to serve Consumer Plain Old Telephone Service (POTS), Business POTS, and Complex Business Customer needs. To be considered operationally ready it is necessary that all seven stages outlined in Paragraphs 42 through 50 be completed prior to implementation.

Function	**Resale**	**UNE**
Pre-Ordering (No industry standards exist)	-AT&T has agreed to accept SWBT's existing DataGate for POTS service -SWBT requires a manual interface for complex business services	-AT&T has agreed to accept SWBT's existing DataGate[4] -SWBT requires a manual interface for complex business services
Ordering & Provisioning	EDI v6.0	-Customer specific elements via industry standard LSR using EDI v6.0
Maintenance	EBI	EBI[5]
Usage Data	EMR	EMR
Local Account Maintenance	CARE Record	CARE Record
Wholesale Bill	-AT&T has agreed to accept an EDI CRIS bill	CABS

55. Even though the discussion below will identify specific problems in the development and use of various electronic interfaces, the Commission should not view them in a vacuum. Indeed, in a real business sense, all of the interfaces must interact together in a manner to assist the customer to receive and the CLEC to provide service. A graphic illustration of the

[4] SWBT's internal UNE process will result in degradation of pre-ordering functionality in comparison to Resale (*i.e.*, no electronic capability to obtain due date and dispatch).

[5] SWBT's internal process will degredate functionality (loss of Mechanical Loop Testing capabilities).

integrated manner in which these interfaces must work together can be seen in Exhibit ND-2. SWBT will likely boast about the individual attributes of some of its internal proprietary systems. As discussed in Paragraph 77 and can be seen in Exhibit ND-6, the ordering and provisioning interface is currently in jeopardy as depicted in red on Exhibit ND-2. Failure of this interface will cause failure in providing quality service to AT&T's customers.

C. SWBT's Provisioning of OSS Has Not Come Easy, If At All -- An Overview of AT&T's and SWBT's Negotiations for OSS.

56. On March 14, 1996, AT&T requested that SWBT commence negotiations for an interconnection agreement under Section 252 of the Federal Act for the states of Texas, Missouri and Oklahoma and on June 11, 1996 for the states of Kansas and Arkansas in the SWBT region.

57. Due to the critical importance of the access to SWBT's OSSs, electronic interfaces and gateways, AT&T shared its objectives for electronic operational interfaces based on industry standards beginning on March 26, 1996.

58. Detailed interface negotiations for Total Service Resale began on April 1, 1996. regarding access to SWBT's OSS through interfaces and gateways. AT&T has been engaged since that time in earnest to complete and to finalize requirements to develop and implement the Total Services Resale (TSR) OSS interfaces. In response to AT&T's request for access to SWBT's OSSs via electronic interfaces, SWBT instead proposed manual interfaces and suggested that AT&T use SWBT's proprietary support system (Easy Access Sales Environment or EASE) interfaces for pre-ordering and ordering/provisioning on April 1, 1996. AT&T recognized from the outset that the use of manual interfaces or EASE was inadequate in providing

nondiscriminatory access to the information needed by AT&T to service local customers and communicated its decision not to use EASE to SWBT on May 9, 1996. The significant deficiencies of SWBT's EASE system to provide CLECs parity access to SWBT's OSSs are described later in this Statement. *See* ¶¶ 85 - 92, *infra*.

59. At the time that AT&T filed for arbitration with SWBT in Texas, Oklahoma, and Missouri (July 29, 1996), SWBT had not agreed to a date upon which it would make the electronic interfaces to its OSSs or the functionality of required its OSSs available for Resale. Additionally, dates for completion of UNE OSS interface negotiations and requirements definition were not and still have not been agreed to. As a result of the Texas arbitration, the Texas Commission ordered that the electronic operational interfaces required for Resale and UNE be implemented not later than June 1, 1997.

60. As of today, even after ten months of negotiations, progress has been slow, and systems impact and requirements definition remain in progress for Resale and UNE interface negotiations and are in the early stages. As can be seen from a review of the pre-ordering, ordering, and provisioning OSS status reports filed with the Texas Public Utility Commission[6], there are significant differences between the interface availability status reported by SWBT and that reported by AT&T. *Compare* Exhibits ND-3 *with* ND-4 and ND-5. The status reports

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[6] As a result of the arbitration proceeding between AT&T and SWBT, the Texas Public Utility Commission ordered SWBT to file status reports regarding the implementation of OSS consistent with its Arbitration Award. Texas Arbitration Award at ¶ 62, and p. 46. SWBT filed its first OSS status report on January 15, 1997 (Ex. ND-3). AT&T found several inaccuracies and filed a response status report on February 12, 1997 (Ex. ND-4). The Commission then ordered the parties to file a joint status report, which was filed on February 28, 1997 (Ex. ND-5). These status reports show the status of each interface for Resale and UNE.

clearly demonstrate that there is little to report with respect to the status of these interfaces for UNE. In fact, the joint AT&T, SWBT, and MCI status report filed with the Texas Commission on February 28, 1997, highlights that SWBT continued to dispute the clear mandate of the Arbitration Award with respect to UNE interfaces. *See* Exhibit ND-5. On March 5, 1997, the Texas Commission once again stated its intent to require comparable interface functionality for UNE as compared to Resale. The status reported by AT&T provides sufficient detail to demonstrate that there are interface negotiations still required to resolve critical development issues that either remain unresolved today or have been resolved only within the last two to three weeks for Resale.

61. The critical issues that were recently resolved (February 14-20) prevented AT&T from moving forward with the systems impact and requirements definition/specifications development stage of the seven-stage development process. After months of negotiations, it took the involvement and escalation to senior management and numerous concessions to resolve these issues. For example, on February 10, 1997, AT&T agreed to use SWBT's USOC/FIDs as opposed to waiting for the industry standard feature codes pending finalization by the Ordering and Billing Forum (OBF) of **all** feature codes. The OBF is an industry body comprised of membership from all of the BOCs and IXCs that determines the standards necessary to communication between entities. Further, it was not until February 9, 1997 that SWBT agreed to accept a single order with multiple lines per the OBF guidelines, and on February 20, 1997, SWBT agreed to provide a single Firm Order Confirmation (FOC) and completion per order. On

February 14, 1997, AT&T agreed to accept a manual interface for jeopardy notifications. Without resolution of these issues, the parties were not in a position: (1) to understand what and how their respective internal systems would be impacted; (2) to begin to design their systems and interfaces; and (3) to determine how long systems development will take.

62. Realizing that in addition to resolving the development issues such as those mentioned in the status reports referenced above, the interfaces must be designed appropriately to handle competitive volumes, AT&T provided its forecasts to SWBT for ordering and provisioning on April 23, 1996, and refined the forecasts on June 11, 1996, for the states under negotiations as of those dates (*i.e.*, Texas, Missouri, and Oklahoma). From a Resale repair and maintenance perspective, SWBT and AT&T agreed that a 3 percent calculation of embedded customer lines would provide the appropriate repair and maintenance forecast projection. With the uncertainties surrounding the availability of UNE combinations, UNE processing and OSS interfaces to support UNE, AT&T has not developed a UNE forecast because without these critical elements it would be sheer speculation to do so. Once it is clear what the decisions are regarding the UNE policy issues, AT&T will be in a better position to prepare its UNE business cases and forecasts. At such time, AT&T will be more than willing to share such information with SWBT.

63. The issue of SWBT's OSS capacity does give AT&T concern. It is not clear from anything that SWBT has ever provided during negotiations or in the SGAT filing that it has the capability to meet the anticipated volume of AT&T, much less other CLECs, both large and

small. In addition, as reflected in the Texas February 28, 1997, joint status report, Exhibit ND-5, AT&T and SWBT have not resolved a supplier billing issue having to do with billing account numbers (BAN). SWBT has a restriction of $10M, 5,000 residential and 10,000 business lines per BAN that it will render to AT&T as SWBT's wholesale customer. It is not clear as to whether or not SWBT's wholesale billing limitations will impact end-user customer orders and installations should these thresholds be reached. Without the resolution of issues such as the BAN issue and without actual and reliable proof of capacity capabilities, the Commission should remain concerned about SWBT's ability to limit competition by contending it does not have sufficient capacity.

64. With the current status of the OSS interfaces required to support Resale and UNE and capacity capabilities unknown, I would *not* agree that SWBT has met the requirements of Section 271 of the FTA. Based on AT&T's recent work on the progress reports filed with the Texas Public Utility Commission, I would state that there is a significant amount of work to be completed in order to support statements that nondiscriminatory access to SWBT's OSS is operationally ready and commercially available.[7] As discussed in the Statement of Edwin Rutan, SWBT must demonstrate that it actually is providing nondiscriminatory access to OSSs in order

[7] It is likely that SWBT will assert that its operation support systems are either operationally ready or close to operational readiness, as it did in its status reports to the Texas Public Utility Commission. It is also likely that SWBT will pledge to complete all operational support systems as soon as it can. But SWBT would be misleading this Commission if it made such assertions. For example, there are numerous discrepancies in the January 15, 1997 SWBT status report that AT&T noted in its response.

to satisfy the competitive checklist -- that is, the OSSs must be commercially operational. Such is simply not the case with OSSs.

D. Operational Electronic Interfaces for Unbundled Network Elements are Virtually Non-Existent, and, Therefore, Cannot be Considered Fully Operational or Commercially Provisioned.

65. SWBT's negotiations and implementation approach regarding access to unbundled network elements and unrestricted combinations of UNE and UNE OSSs can best be described as a flagrant disregard of the law, particularly the FCC's implementing regulations. SWBT's approach has been and continues to be to refuse to provide UNE combinations including the platform and to offer UNEs in a way that is prohibitively priced and fraught with customer dissatisfaction.

66. With respect to UNE OSSs, industry standards have been defined on a very limited basis and this has limited AT&T's progress with SWBT. AT&T and SWBT are only in the early stages of negotiations for electronic interfaces. It is inconceivable that anyone from either side can assert that the implementation of OSS for UNE is "well on its way."

67. Prior to the issuance of the FCC Order, AT&T and SWBT had reached a deadlock with respect to UNE regulations. SWBT limited its offer to five elements. AT&T was not only advocating that it was technically feasible for SWBT to unbundle its network beyond these five elements (Letter dated June 5, 1996 from Nancy Dalton to Gary Juhl), but that the OSSs and interfaces between AT&T and SWBT should be established in a manner that would facilitate the ordering of UNEs in combinations.(Letter dated June 5, 1996 from Surendra Saboo to Gary Juhl).

During a leadership team meeting between AT&T and SWBT on September 3, 1996, SWBT agreed to offer the FCC-ordered UNEs, but did not agree that the FCC Order, which states that UNEs must be available in combination without restriction, included the UNE platform (the combination of all network elements required to provide local service to customers). During the weeks immediately following this September 3 decision, the focus of AT&T and SWBT negotiations was limited to the definition of the unbundled network elements. For the UNE pre-ordering, ordering, provisioning and supplier billing interfaces, AT&T provided detailed requirements to SWBT for UNE interfaces on October 2, 1996, and it was not until October 16, 1996 that AT&T and SWBT began detailed negotiations regarding these UNE OSS interfaces. AT&T and SWBT had reached agreement during the initial phases of negotiations that the EBI interface developed for Resale would be the same for UNE and that the end-user usage data transfer and local account maintenance interfaces would also be the same.

68. SWBT's operations support system interfaces to support UNE are not presently in a state of operational readiness for a number of reasons.

69. *First*, and foremost, AT&T and SWBT have not concluded and are still in the early stages of UNE OSS interface negotiations. As noted above, AT&T requested that SWBT provide the capabilities to order UNEs individually and in combination, including the UNE platform in June 1996. At that time SWBT refused and continues to refuse to provide the UNE platform on the grounds that it is not obligated to do so under the FTA. As such, it is not practical to believe that the OSSs are available for AT&T to provide telephone exchange service to its customers

through the combination of UNEs and the UNE platform. This is due principally to the late start of these negotiations and the fundamental disagreement about the combination of UNEs and the UNE platform.

70. *Second*, as noted in the February 28, 1997 status report filed with the Texas PUC (*see* Exhibit ND-5), AT&T and SWBT have significant disagreement over the ordering functionality required for UNE and the time frames for development. In addition, unlike its position for Resale, SWBT is waiting for clear definitions from the OBF to define and design the processes for UNE ordering/provisioning as opposed to working with AT&T to implement an agreement between the companies pending the availability of OBF standards. As recognized by the Texas PUC, SWBT's rationale is disingenuous given its agreement to work without such standards for Resale.

71. *Third*, the details necessary to complete the systems impact analysis and develop requirements and specifications to support the ordering and provisioning transactions for Resale have only recently been resolved for the majority of the critical issues, and several critical issues remain unresolved. For example the issues associated with processing orders with multiple lines were not fully resolved until February 20, 1997; issues associated with directory listings for even the simplest of orders (*e.g.*, new single line) were also not resolved until February 20, 1997. These same issues must also be resolved to support the UNE ordering and provisioning interface transactions in order to complete the systems impact analysis, define system/interface requirements, and develop the system/interface specifications.

72. *Fourth*, although AT&T and SWBT have reached agreement that the same pre-ordering DataGate interfaces under development for Resale will also be used for UNE, SWBT is not intending to provide AT&T with the same level of functionality for UNE pre-ordering as it is planning to provide for Resale. More specifically, as defined in the Joint Statement of Robert Falcone and Steven Turner, SWBT has made an internal policy decision to treat UNEs as "design circuits." As a result, AT&T will not have electronic access to assignment of earliest available due dates or schedule a dispatch (when required) for its customers and must quote standard intervals provided by SWBT or call SWBT to provide the necessary information. This will even be the case in situations where customers have existing AT&T Resold or SWBT service and do not want any changes to their service -- the only difference being AT&T's choice to serve its customers via UNEs.

73. *Fifth*, as is the case with pre-ordering, SWBT's internal decision to treat UNEs as "design circuits" will also degredate the provisioning, and maintenance functionality. During the provisioning of customers on an AT&T requested platform of UNEs, SWBT will disconnect the customer's service for an undefined period of time to install special circuit test points. In addition to this interruption of customer service, for repair and maintenance AT&T will not have the trouble isolation capabilities such as MLT that was available to it in the Resale environment and will be dependent on SWBT for loop testing and trouble isolation. As is the case with installation, repair and maintenance intervals will also be elongated.

74. The provision of UNE OSS is the single most critical barrier to competition as envisioned by the FTA. As I have outlined above and as further explained in the Joint Statement of Steven Turner and Robert Falcone, the availability of and access to UNEs are the bridge to facilities-based competition from Resale. SWBT knows the importance of UNEs also, which explains its refusal to engage in meaningful discussions on UNEs since negotiations began on March 14, 1996 and why it has taken these anti-competitive OSS positions for UNE.

E. As a Result of SWBT's Failure to Provide Nondiscriminatory Access to SWBT's OSSs Via Electronic Interfaces, AT&T has Agreed to Use SWBT's Proprietary Systems on an Interim Basis to Serve Only Residential Resale Customers.

75. As of the date of the filing of this Statement, I would summarize the following relative to the status of the deployment of OSS interfaces:

76. As described previously in this Statement, there are numerous critical developmental issues that have recently been resolved and some that remain unresolved for the Resale ordering and provisioning interfaces. With the system impact, system requirements/specification development, coding development, testing and implementation stages yet to be completed, AT&T is uncertain as to whether or not the ordering and provisioning interfaces will be available on June 1, 1997, as ordered by the Texas Commission and uncertainty also exists with respect to the volume capacity this interface will be capable of supporting.

77. Pre-ordering, ordering and provisioning is the most critical interface required to provide service to customers. It enables the CLEC to complete and transmit a service order for SWBT using the CLECs own internal systems, obtain an order receipt, return of acknowledgments

of orders, edit for valid information, return of error information, order confirmation, return of service order completion status, and other vital steps. With the critical issues that remain outstanding and the numerous issues not negotiated to resolution until very recently, AT&T declared that implementation of the ordering and provisioning interface by June 1, 1997, to be *in jeopardy*.[8] *See* letter dated February 14, 1997, from Rian Wren to Stephen Carter (Exhibit ND-6).

78. The OSS interfaces required to support UNE are in the early stages of negotiations and with numerous policy issues remaining unresolved. These policy issues will certainly impact the implementation decisions and timeliness associated with the OSS interfaces required for UNE.

79. AT&T must be in a position to begin to offer local service and take the initial steps towards creating a competitive environment as opposed to allowing SWBT to continue to hold AT&T's marketing entry hostage and prevent it from meeting its business plan objectives. To that end, AT&T has made a decision to pursue dual entry paths and use SWBT's internal proprietary systems, EASE for pre-ordering, ordering and provisioning and CNA for repair and maintenance, to provide Resold service to its residential customers. AT&T has made this decision to ensure earliest market entry despite the inherent limitations of SWBT's proprietary systems and the additional expense and capital requirements of such a decision. AT&T will aggressively work with SWBT to implement the interfaces the parties have agreed to as described in Paragraph 54 to ensure

[8] The jeopardy situation for ordering and provisioning is shown in Exhibit ND-2 in red. One can see that the EDI jeopardy is a critical and vital component of the OSS implementation.

that AT&T's residential market entry will address all levels of functionality with the appropriate capacity.

80. CNA is used by SWBT's business division customers for reporting troubles and obtaining status on reported troubles. As is the case with EASE, AT&T has made the decision to use SWBT's CNA system on an interim basis pending the implementation of the EBI interface between the entities for repair and maintenance.

81. Although SWBT had been advocating its proprietary systems as opposed to the agreed to interfaces required to provide nondiscriminatory access to SWBT's OSSs, it seems that after AT&T made this decision to use EASE, and CNA on an interim basis, SWBT began to introduce additional costs as a way to introduce additional delays. AT&T had ordered provisioning of a T1.5 circuit for use in testing EASE as well as performing the testing of DataGate for pre-ordering. The circuit activation was also delayed after AT&T's formal decision to use EASE was communicated to SWBT.

82. SWBT halted the activation of the circuit until AT&T agreed to not only SWBT's EASE prices, but for the first time introduced overall prices for access to all OSSs. Via letter, SWBT informed AT&T that "before connectivity is established, we need to obtain AT&T's agreement and acceptance of SWBT's position regarding the rates that will apply to AT&T's requested connectivity to EASE, as well as other OSS functions . . .." Letter dated February 10, 1997 from Alfred Todd, Jr. to Greg Terry (Exhibit ND-7). This action took place *the day before* the circuit was scheduled to be activated and it basically held the connection to test the EASE

circuit "hostage" and required AT&T not only to agree to SWBT's position and prices for EASE. but also to a rate structure for all of SWBT's operation support systems. SWBT "apologized" for the timing, but deemed it necessary for functional availability.

83. SWBT's February 10, 1997 notification was the *first* indication of any price issues with using EASE for Resale and, as can be seen from the letter, was not supported by cost studies or explanations as to methodologies for calculations. To assure AT&T's ability to test the connectivity to EASE, AT&T promptly agreed to the prices under protest to continue the process for final installation of the T1.5 circuit for connectivity to EASE via a letter to Alfred Todd, Jr. dated February 11, 1997 from Surendra Saboo. (Exhibit ND-8). The circuit is now operational and AT&T is in the process of testing the operational functionality of SWBT's EASE interfaces for pre-ordering, ordering and provisioning. This bears scrutiny by this Commission and raises a perfect example of the monopolistic hold that SWBT wields for operation supports systems.

84. EASE does not qualify as an electronic interface as required by the FCC Order. EASE will be used on an interim basis only due to the fact that there have been so many problems resolving the EDI implementation issues. AT&T's agreement is a fall back and safeguard but does not provide the level of functionality to serve all customer segments. Moreover, it does not provide a complete electronic interface even where it can be used.

85. SWBT's consumer EASE (C-EASE) System is inherently an inferior substitute for the EDI interface. There are significant shortcomings that, if used for very long, will place

AT&T and any other CLECs at a significant competitive disadvantage. I will describe the most significant problems with C-EASE in the following paragraphs.

86. *First*, AT&T's use of EASE on an interim basis does not afford comparable interfaces to those used by SWBT retail customer service representatives when servicing the needs of SWBT customers. As can be seen from the graphic illustration in Exhibit ND-9, because EASE is a proprietary SWBT system, it is not interconnected to the downstream systems of AT&T as it is within SWBT. For example, as an order is processed through EASE in SWBT, the information pertinent to the customer account is distributed automatically to the appropriate SWBT downstream customer account and billing systems required for billing and servicing customers. In addition, SWBT, like AT&T, has implemented an architecture whereby its customer service representatives use one process, set of system, terminals and screens across its company to service customers. In comparison, the AT&T customer service representative will be required to:

- process some transactions through C-EASE, others through SORD (*i.e.*, supplemental orders) and yet others manually (*i.e.*, partial migrations); and
- perform dual entry of customer order information into EASE and AT&T's own ordering system, so that AT&T's customer account information can be stored and fed downstream to billing systems. This increases the time to complete an order thus increasing AT&T's sales execution time frames and costs (development is required to implement a split-screen for the AT&T customer service representatives).

87. *Second*, using C-EASE, AT&T will experience the following additional shortcomings and constraints:

- Development of complex Methods and Procedures (M&Ps) for the use of dual systems by AT&T's customer service representatives; and

- EASE is not capable of supporting UNEs.

88. *Third*, as a result of the limitations constraints and duplicate/customized work efforts described in Paragraphs 86 and 87 above, *e.g.*, limitations in service offerings, use of numerous systems, manual processing, redundancy of work steps, and increased error risks, C-EASE *does not* meet the requirements of Section 271 because it does not provide nondiscriminatory access to OCCs.[9]

89. SWBT's Business EASE (B-EASE) is even more deficient than C-EASE to the point that it does not provide AT&T with an interim solution to address the Business Market segments.

90. In addition to the shortcomings and constraints described for C-EASE, B-EASE has the following shortcomings:

- the B-EASE platform is based on an OS-2 operating system and will require the CLEC to use two terminals, as opposed to the split screen capability for residence;

- B-EASE is limited to Business POTS with less than 30 lines;

- B-EASE does not support complex business services, *e.g.*, PBX/DID trunks, ISDN, and Centrex; and

- B-EASE does not support complex order and requires a manual interface; and

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[9] C-EASE fails to provide nondiscriminatory access in terms of data accuracy, timeliness of transactions, availability of information, and tracking mechanisms.

- The lack of the partial migration capability is more detrimental in the business markets where it is more likely that business customers choose multiple carriers (long distance experience).

91. As such, SWBT cannot claim that provision of EASE to CLECs provides parity with its own operation support systems.

92. With respect to the processing of large business orders, SWBT will likely contend that because it handles the complex business orders manually, that manual processing for CLECs is at least parity. I do *not* agree. In this scenario, there is additional manual processing and delay introduced as a result of two service representatives (AT&T and SWBT) being required to write, input, fax, and re-input the order. Multiple personnel and multiple manual entries are not inherent in the SWBT environment.

93. Today, AT&T is not aware of any CLEC using electronic interfaces for pre-ordering, ordering, and provisioning. AT&T is not surprised at this state of affairs, given the confrontation and delay tactics imposed by SWBT for implementation of OSS interfaces. Indeed, the Commission should look long and hard at the reasons that SWBT has failed to implement and commercially provision electronic interfaces.

V. NONDISCRIMINATORY ACCESS TO OPERATIONS SUPPORT SYSTEMS

94. Even if SWBT's proposed OSS interfaces were in a condition of operational readiness, that would not establish that SWBT was actually providing AT&T and other CLECs with nondiscriminatory access to its operations support systems. SWBT must show more than that

it is providing the CLECs with access to its operations supports systems; it must show that the access being provided is nondiscriminatory.

95. To make this showing of nondiscriminatory access, the access provided by SWBT must be monitored to show that SWBT's interfaces actually provide the CLECs with access to its systems with an equivalent level of accuracy, reliability, and timeliness as compared to the access that SWBT provides to its own customer representatives in response to the volumes handled by the CLEC. Unless SWBT submits any performance data for the access to its operations support systems that it has offered to CLECs, SWBT has not established that it is actually providing nondiscriminatory access.

96. To establish that SWBT is providing nondiscriminatory access to its operations support systems, a series of performance measurements, reporting and monitoring mechanisms will be required. Because of SWBT's strategy of delay in connection with OSSs and UNEs, these simply do not exist. These are crucial to a showing that SWBT has complied with the competitive checklist and, as a result, Section 271 relief should be denied until such a showing is made.

VI. NONDISCRIMINATORY ACCESS TO 911, E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION SERVICES, AND WHITE PAGES DIRECTORY LISTINGS IS NOT KNOWN AT THIS TIME.

97. To date, AT&T has not seen implementation of SWBT's obligations under Sections 271(c)(2)(B)(vii)(I), (II), and (III) with respect to provision of nondiscriminatory access to 911 and E911 service, directory assistance services, and operator call completion services. In addition, AT&T has not seen any implementation of SWBT's obligations under Section

271(c)(2)(B)(iii) for white page directory listings for CLEC customers. The SGAT is sufficiently vague, so that it is impossible, at this time, to render an opinion on SWBT's compliance. SWBT should be required to provide all steps taken to implement each of these items on the competitive checklist. A mere pledge to implement is not enough.

VII. CONCLUSION

98. As an active participant in the negotiation, development, and finalization of electronic interfaces, I contend that SWBT does not have in place operationally ready interfaces that are or soon will be providing CLECs with nondiscriminatory access to SWBT's operations support systems. SWBT has not yet provided interface specifications that would make it feasible for AT&T or any other CLEC to provide service using the UNE platform. SWBT has not yet provided stable or complete specifications and other necessary related information for either its ordering and provisioning interfaces. The many problems that AT&T has encountered throughout the negotiations process make it fanciful to believe SWBT's claim that the proposed interfaces will be adequate to support competitive entry by CLECs on a large scale. Finally, SWBT will not be able to demonstrate that it is providing CLECs with nondiscriminatory access to all of its operations support systems. Accordingly, SWBT has not fully implemented its obligation to provide CLECs with nondiscriminatory access to its operations support systems.

VERIFICATION

STATE OF TEXAS)
)
COUNTY OF Dallas)

I, NANCY DALTON, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement; and the information contained in the foregoing statement is true and correct to the best of my knowledge and belief.

Nancy Dalton
NANCY DALTON
AT&T

SUBSCRIBED AND SWORN TO BEFORE ME this 6th day of March, 1997.

Debbie Crawford
Notary Public

My Commission Expires:

_____

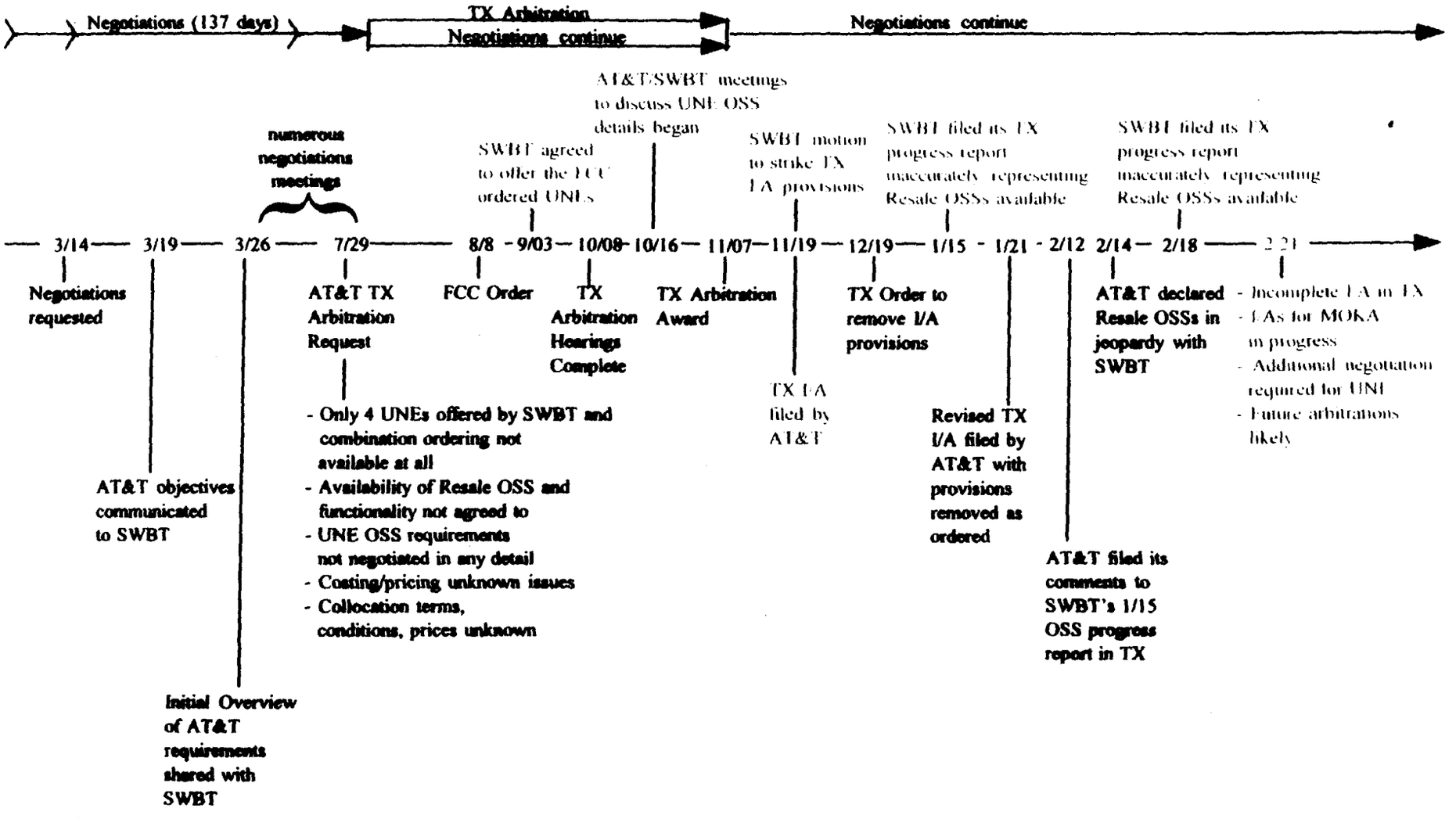
DEBBIE CRAWFORD
COMMISSION EXPIRES
JANUARY 17, 1998

EXHIBIT ND-1

AT&T/SWBT NEGOTIATIONS TIMELINE

AT&T/SWBT Negotiations Timeline

By and large, substantive issues requiring negotiations were ordered by the state commissions – not resolved through negotiations and some remain unresolved resulting in an incomplete Texas Interconnection Agreement.



I/A - Interconnection Agreement

Note: Missouri, Oklahoma, Kansas, and Arkansas arbitration dates not reflected

EXHIBIT ND-2

ELECTRONIC OPERATIONAL INTERFACE AGREEMENTS

Electronic Operational *Interface* Agreements

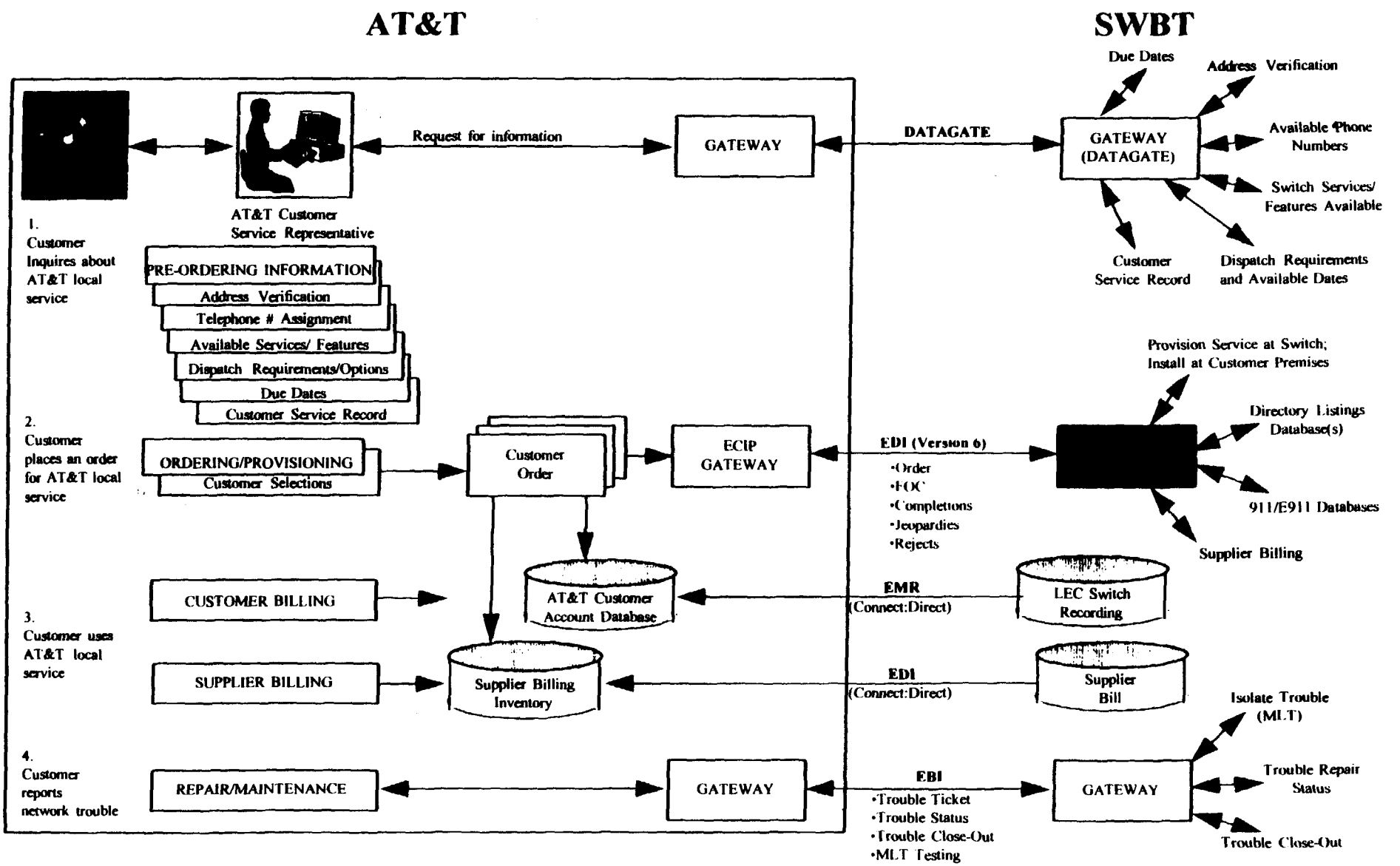


EXHIBIT ND-3

AT&T JANUARY 15, 1997 PROGRESS REPORT TO TEXAS PUC ON ELECTRONIC INTERFACES